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March 7, 2017

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Docket Nos. 10-51 & 03-123 - Ex Parte Notice

Dear Ms. Dortch:

On March 3, 2016, Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”); Zainab Alkebsi, Policy Counsel, National Association of the Deaf (“NAD”); Christian Vogler, Gallaudet University (“Gallaudet”); and the undersigned (together, the “Consumer Group representatives”) participated in a meeting with Nicholas Degani, Senior Legal Counsel to Chairman Pai, and Zenji Nakazawa, Acting Public Safety and Consumer Protection Advisor to Chairman Pai.

The Consumer Groups representatives expressed their support and gratitude for the proposed rules in the draft of video relay service (“VRS”) Report and Order (“R&O”), Notice of Inquiry (“NOI”), Further Notice of Proposed Rulemaking (“FNPRM”), and Order. Specifically, the Consumer Groups support the FCC’s adoption of trials for skills-based routing and deaf interpreters, making iTRS phone numbers available to hearing individuals to allow direct-dialed video calls with deaf and hard-of-hearing consumers, and at-home VRS call handling with proposed safeguards. The Consumer Groups have requested for multiple years that the Commission implement skills-based routing, use of deaf interpreters, and making iTRS phone numbers available to hearing individuals. They commend the FCC for its plans to adopt the aforementioned rules in the R&O.

The Consumer Groups representatives support the rule in the R&O to publish speed-of-answer performance data. They restated their continued support to strengthen speed-of-answer requirements and encouraged the FCC to adopt such requirements as soon as possible, which they acknowledge may be tied to VRS rates subject to comment in the FNPRM.

In addition, the Consumer Groups representatives support the FCC’s decision to seek additional comment in the FNPRM on VRS provider rates. As previously stated, the

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Consumer Groups want the FCC to sufficiently compensate all VRS providers and ensure competition in the VRS marketplace.

Regarding the NOI, the Consumer Groups representatives applaud the Commission's decision to take steps to develop service quality metrics. Objective metrics will help to address the Consumer Groups' ongoing concern that service quality has and continues to decline. Better service quality would ultimately benefit both consumers and the FCC because it would mean less waste of time and funds due to poor service quality.

Regarding the research and development ("R&D") Order, the Consumer Groups representatives welcome funding for R&D. They strongly encouraged the FCC to reach out to the deaf and hard-of-hearing community, academic research institutions, and VRS providers to participate in R&D, in addition to federally funded R&D centers. Participation by all industry constituents will improve the R&D process since all constituents may provide the FCC with valuable data. They noted that R&D monitoring in the proposed Order is open-ended and suggested the FCC consider identifying certain metrics to ensure the goals of functional equivalence are met.

Consumer Groups appreciate the Commission's attention to these matters. If there are any questions, please feel free to contact us.

Respectfully submitted,

/s/ Danielle Burt

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Counsel for Telecommunications for the Deaf and Hard of Hearing, Inc.

cc (via email): Nicholas Degani
Zenji Nakazawa
Claude Stout
Zainab Alkebsi
Christian Vogler